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May 15, 2013

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

***Via Electronic Filing***

**Re: WC Docket No. 12-375, *Rates for Interstate Inmate Calling Services*  
WC Docket No. 11-42, *Lifeline and Link Up Modernization*  
MB Docket No. 09-182, *2010 Quadrennial Review*  
MB Docket No. 07-294, *Diversification of Ownership in the Broadcasting Services*  
MM Docket No. 00-168, *Standardized and Enhanced Disclosure Requirements***

Dear Ms. Dortch,

On May 13, 2013, I met with Dave Grimaldi, Chief of Staff and Media Legal Advisor for Commissioner Clyburn. We discussed issues in the above-captioned dockets that may be considered during Commissioner Clyburn's tenure as interim Chair.

On the topic of the Quadrennial Review, I presented once more Free Press's initial views of a study proposal submitted by the Minority Media and Telecommunications Council.<sup>1</sup> The study reportedly consists of interviews with former and current broadcast station principals and executives. As Free Press has noted previously in these dockets, we appreciate the Commission's acknowledgement that it requires more evidence before moving ahead with rule changes that harm ownership diversity. However, based on our understanding of this qualitative study's methodology, we have serious concerns about its ability to provide the sort of analysis required by the Third Circuit Court of Appeals in the *Prometheus II* decision.

With regard to Inmate Calling Services and Broadcast Disclosure, I suggested that Commissioner Clyburn continue her efforts to advance ongoing proceedings in those dockets – by, for example, directing staff to draft an item in the prison phone docket, in which comments and replies have been submitted; or by seeking comment on a petition for rulemaking to require disclosure of the true identity of entities funding political advertisements. On the topic of Lifeline, I suggested only that Commissioner Clyburn continue during her time as Chair to clarify the program's functions and funding, and to emphasize the ongoing importance of this mechanism while considering any reforms.

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<sup>1</sup> See Letter from David Honig to Julius Genachowski, MB Docket Nos. 09-182, 07-294 (filed Feb. 25, 2013).

We file this *ex parte* notice today, pursuant to Section 1.1206(b) of the Commission's rules. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/ Matthew F. Wood

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